

# **EXHIBIT J**

1 A. Yeah.

2 Q. Do you know for a fact that  
3 Chase is the entity that reports what's  
4 in the date of status field?

5 A. No.

6 Q. What are you looking for  
7 Chase from this lawsuit?

8 A. Damages.

9 Q. And what are your damages?

10 A. My damages would be that  
11 there was incorrect information on my  
12 credit report.

13 Q. Are you able to monetize  
14 those damages?

15 MR. ZEMEL: Object to form.

16 THE WITNESS: I don't know.

17 BY MS. PERKINS:

18 Q. Are you able to tell me  
19 today what figure represents your  
20 damages, what monetary figure represents  
21 your damages?

22 A. No. I personally can't tell  
23 you that.

24 Q. Can you tell me how you were

1     damaged?

2             A.     My rights were violated.  
3     Dates were changed on my credit report  
4     that were inaccurate.

5             Q.     And can you tell me if the  
6     date of status as you allege being  
7     inaccurate, did that lead to -- did that  
8     lead to you being damaged?

9             A.     My rights were violated.

10            Q.     Did you have any other types  
11     of damages? Can you point to a number  
12     and say Chase is responsible for X  
13     because of this?

14            A.     No.

15            Q.     Are you aware that your  
16     counsel, not Mr. Zemel, but Mr. Linker,  
17     represented to the Court that you don't  
18     have actual damages in this lawsuit?

19            A.     No.

20            Q.     Do you know the difference  
21     between actual damages and statutory  
22     damages?

23            A.     No.

24            Q.     If you were sitting right

1 now before the judge and the judge asked  
2 you, what are your actual damages, could  
3 you quantify that for me, what would you  
4 say?

5 A. I would say I don't know.

6 Q. You previously mentioned  
7 that you filed for BK. Right?

8 A. Yes.

9 Q. And when did you file for  
10 bankruptcy?

11 A. April of '15.

12 Q. And did you file jointly or  
13 as a single debtor?

14 A. Single debtor, I believe.

15 Q. Was anybody involved in your  
16 bankruptcy petition? Did you file  
17 bankruptcy with your husband?

18 A. Yes.

19 Q. So I'm going to represent  
20 for you that that was actually a joint  
21 bankruptcy.

22 A. Okay.

23 Q. Now, why did you -- what led  
24 to you filing for bankruptcy?

1 score. What's your understanding of what  
2 a credit score is?

3 A. It's a number that says how  
4 good your credit is.

5 Q. And do you know what your  
6 credit score is sitting here today?

7 A. No, I don't.

8 Q. Do you know what your credit  
9 score was in August of 2017 when you  
10 believe the letters were transmitted to  
11 Experian about the Chase reporting?

12 A. No, I don't.

13 Q. Was there ever a time that  
14 you knew what your credit score was?

15 A. Yeah.

16 Q. And when was that?

17 A. I don't know.

18 Q. Do you recall what that  
19 credit score number was?

20 A. I would be guessing.

21 Q. So sitting here today, you  
22 don't know what your credit score is.

23 A. No, not the exact score, no.

24 Q. In this Interrogatory

1 response, it states that the reporting of  
2 the date of status for Chase as not being  
3 April of 2015 lowered your credit score.

4 A. Yes.

5 Q. How do you know it lowered  
6 your credit score?

7 A. Because it changed the date  
8 to a sooner date, so it would make sense  
9 that --

10 Q. Did you check to see if your  
11 credit score was lowered?

12 A. My husband would have. I  
13 did not.

14 Q. Did you ask your husband if  
15 your credit score was lowered?

16 A. He told me it was.

17 Q. Okay.

18 A. Or -- I don't know what he  
19 said, but that was my idea of it.

20 Q. It also says that your date  
21 of status gave third parties the  
22 assumption that you're not creditworthy.  
23 To the extent you know, why would an  
24 incorrect date of status infer to third